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BAY AREA RAPID TRANSIT DISTRICT
and NOLAN PIANTA

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Attorneys for Defendants
CITY OF OAKLAND and OFFICER MICHAEL STOLZMAN

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO BRANCH

MEGAN SHEEHAN,

Case No. C14-03156 LB

Plaintiff,

**UPDATED JOINT CASE MANAGEMENT
CONFERENCE STATEMENT**

v.

BAY AREA RAPID TRANSIT, NOLAN
PIANTA, CITY OF OAKLAND, MICHAEL
STOLZMAN, and DOES 1-20, inclusive.
Defendants.

Date: October 8, 2015
Time: 11: 00 a.m.
Dept: 15th Fl. Crtrm. C

Plaintiff Megan Sheehan, and defendants BART, Nolan Pianta, City of Oakland and Officer Michael Stolzman, through counsel, jointly submit this updated Case Management Conference Statement pursuant to the Court's June 26, 2015 Case Management and Pretrial Order (Dkt. 55) and the July 21, 2015 stipulation and order amending discovery cut-off deadline re: rebuttal and expert disclosures (Dkt. 58).

The parties participated in a settlement conference on September 24, 2015, which did not resolve the case.

Plaintiff requested mutually convenient dates for the following BART depositions.

1. Person who authored BART's Internal Affairs five-page memorandum which was produced to plaintiff and discussed in several depositions;
2. Lt. Haight (if he is not the author of the report);
3. Deputy Chief Jennings; and,
4. Chief Rainey from BART.

Plaintiff has also inquired whether Oakland has completed its Internal Affairs ("IA") investigation because she wishes to depose the IA investigator and the chain of command who reviewed and approved the findings and conclusions including the Chief.

Defendants' counsel responded that they are checking with their clients and Oakland provided available dates.

To assist the court, and, according to two court orders, the case-management schedule in this case is as follows.

Case Event	Filing Date/Disclosure Deadline/Hearing Date
Non-expert discovery completion date	12/7/15
Expert disclosures required by FRCP	12/7/15
Rebuttal expert disclosures	12/21/15
Expert discovery completion date	1/21/16
Last hearing date for dispositive motions and/or further case management conference	1/21/16 at 9:30 a.m.
Meet and confer regarding pretrial filings	2/12/16

1	Pretrial filings due	3/3/16
2	Oppositions, Objections, Ex.s, and Depo Designations due	3/17/16
3	Final Pretrial Conference	4/7/16 at 1:30 p.m.
4	Trial	4/18/16 at 8:30 a.m.
5	Length of Trial	5 days

6 Dated: October 1, 2015

Respectfully submitted,

7 SCOTT LAW FIRM

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9 By: /s/Lizabeth N. de Vries

Lizabeth N. de Vries

10 Attorney for Plaintiff

11 DATED: October 1, 2015

EDRINGTON, SCHIRMER & MURPHY LLP

12
13 By: /s/Owen T. Rooney

Owen T. Rooney

14 Attorney for BART and NOLAN PIANTA

15 Date: October 1, 2015

BARBARA J. PARKER, City Attorney

16 OTIS McGEE, JR., Chief Assistant City Attorney

17 JAMES F. HODGKINS, Supervising Trial Attorney

18 By: /s/James Hodgkins

19 James Hodgkins

Attorneys for Defendants

20 CITY OF OAKLAND and

21 MICHAEL STOLZMAN